UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LINNEA MICHAELS, MARY-KATHRYN ZONI and REV. SUSAN J. McCONE

Plaintiff,

-against-

FELLOWSHIP AT AUSCHWITZ FOR THE STUDY OF PROFESSIONAL ETHICS, C. DAVID GOLDMAN, ANDREW EDER, ERIC MULLER, DEBBIE BISNO, NANCY ANGOFF, FREDERICK MARINO, THORSTEN WAGNER, JOHN DOES 1-10, and XYZ CORPORATIONS 1-10, jointly and severally,

Defendants.

Docket No. 1:20-cv-05414-RA

DECLARATION OF C. DAVID GOLDMAN

- C. DAVID GOLDMAN, of full age, hereby declares as follows:
- 1. I am a Defendant in this action as well as Chair of the Board of Directors of Defendant Fellowship at Auschwitz for the Study of Professional Ethics ("FASPE"). In that capacity, I am well informed and have personal knowledge as to any legal documents served upon FASPE.
- 2. FASPE has never been served with an administrative charge or complaint of discrimination or retaliation filed by any of the Plaintiffs with the Equal Employment Opportunity Commission, the New York State Division of Human Rights, or any other governmental agency.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March [], 2021

C. DAVID GOLDMAN